

## UNITED STATES DISTRICT COURT

for the

EASTERN District of PENNSYLVANIA

CIVIL Division

TYRRELL JONES-EILAND

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Universal Health Services, Inc. Marc D. Miller,  
Christopher Loftus, James Zolnowski, Sajit Pullarkat,  
Janet Wright, Et al.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	TYRRELL JONES-EILAND
Street Address	8805 CHINABERRY DRIVE
City and County	TAMPA HILLSBOROUGH
State and Zip Code	FLORIDA 33637
Telephone Number	9143443687
E-mail Address	TYRRELL.JONES77@GMAIL.COM

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	Sajit Pullarkat
Job or Title <i>(if known)</i>	Chief Executive Officer-Managing Director-Centennial Hills
Street Address	6900 N. Durango Drive
City and County	Las Vegas, Clark
State and Zip Code	Nevada, 89149
Telephone Number	7028359720
E-mail Address <i>(if known)</i>	sajit.pullarkat@uhsinc.com

## Defendant No. 2

Name	Christpher Loftus
Job or Title <i>(if known)</i>	Chief Executive Officer-Managing Director Desert Springs
Street Address	2075 E. Flamingo Road
City and County	Las Vegas, Clark
State and Zip Code	Nevada 89119
Telephone Number	7037338800
E-mail Address <i>(if known)</i>	christopher.loftus@uhsinc.com

## Defendant No. 3

Name	James Zolnowski MSN, RN NE-BC
Job or Title <i>(if known)</i>	Director, Emergency Department Desert Springs Hospital
Street Address	2075 E. Flamingo Road
City and County	Las Vegas, Clark
State and Zip Code	Nevada 89119
Telephone Number	7164453392
E-mail Address <i>(if known)</i>	james.zolnowski@uhsinc.com

## Defendant No. 4

Name	Marc D. Miller
Job or Title <i>(if known)</i>	President-Universal Health Services, Inc.
Street Address	367 South Gulph Road
City and County	King of Prussia Montgomery
State and Zip Code	Pennsylvania 19406
Telephone Number	6107683300
E-mail Address <i>(if known)</i>	m.miller@uhsinc.com

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

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## Defendant No. 1

Name	Janet Wright
Job or Title <i>(if known)</i>	Chief Nursing Officer
Street Address	6900 N. Durango Drive
City and County	Las Vegas Clark
State and Zip Code	Nevada 89149
Telephone Number	7028359703
E-mail Address <i>(if known)</i>	janet.wright@uhsinc.com

## Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Tyrrell Jones-Eiland, is a citizen of the  
State of *(name)* Florida.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* Marc D. Miller, is a citizen of  
the State of *(name)* Pennsylvania. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

**II. Basis for Jurisdiction**

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List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Tyrrell Jones-Eiland, is a citizen of the State of *(name)* Florida.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* Janet Wright, is a citizen of the State of *(name)* Nevada. Or is a citizen of *(foreign nation)* \_\_\_\_\_.

**II. Basis for Jurisdiction**

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List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Tyrrell Jones-Eiland, is a citizen of the State of *(name)* Florida.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* James Zolnowski, is a citizen of the State of *(name)* Nevada. Or is a citizen of *(foreign nation)* \_\_\_\_\_.

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

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List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, *(name)* Tyrrell Jones-Eiland, is a citizen of the State of *(name)* Florida.

## b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, *(name)* Sajit Pullarkat, is a citizen of the State of *(name)* Nevada. Or is a citizen of *(foreign nation)* \_\_\_\_\_.

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

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The plaintiff, *(name)* Tyrrell Jones-Eiland, is a citizen of the State of *(name)* Florida.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* Christopher Loftus, is a citizen of the State of *(name)* Nevada. Or is a citizen of *(foreign nation)* \_\_\_\_\_.



## b. If the defendant is a corporation

The defendant, (name) Universal Health Services, Inc., is incorporated under the laws of the State of (name) Pennsylvania, and has its principal place of business in the State of (name) Nevada.  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
 and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Medical bills, loss of income, pain and suffering, loss of consortium are more than \$75,000.

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Defendants Zolnowski and Loftus (Desert Springs) failed to provide adequate medical care, discharged plaintiff without running necessary tests and exams and caused further medical incident; lied to insurance company and billed for services never rendered. Defendants Pullarkat and Wright (Centennial Hills) prematurely discharged plaintiff who was rushed back to same hospital the next day and remained in serious conditions for two weeks then transferred to a medical rehabilitation center for two months, Defendants misdiagnosed plaintiff and could have caused death. Defendants have all refused to release medical documents and have caused major financial issues.

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Current Medical Bills  
 Future Medical Bills  
 Loss of Consortium  
 Loss of Wages  
 Punitive Damamges  
 total demand \$20,000,000

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

10/26/2020

Signature of Plaintiff

Printed Name of Plaintiff

TYRRELL JONES-EILAND

**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

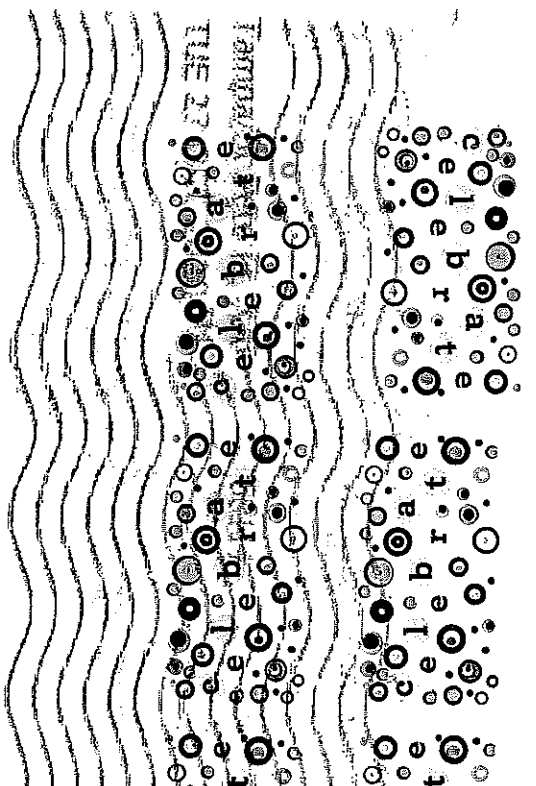
State and Zip Code

Telephone Number

E-mail Address

T. Jones Field  
8805 Chambers Drive  
Tampa, FL 33637

U.S.M.S.  
X-PAY



UNITED STATES District Court  
District of Eastern Pennsylvania  
James A. Byrne U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106  
Attention: Clerk of Court